

Brian A. Bender, Esq. (BAB-0218)  
Harris Beach PLLC  
100 Wall Street  
New York, New York 10005  
(212) 687-0100

*Attorneys for Defendant*  
**LEFRAK ORGANIZATION, INC.**

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RODRIGO CAMPOZANO (AND WIFE, ESTHER  
CAMPOZANO),

Plaintiffs,

-against-

Case No.:  
07-CV-4459 (AKH)

100 CHURCH, LLC, 120 BROADWAY  
CONDOMINIUM (CONDO #871), 120 BROADWAY  
HOLDING, LLC, 120 BROADWAY PROPERTIES,  
LLC, 120 BROADWAY, LLC, 50 TRINITY, LLC, 53  
PARK PLACE LLC, 715 REALTY CORP., 88  
GREENWICH LLC, 90 CHURCH STREET LIMITED  
PARTNERSHIP, AJ GOLDSTEIN & CO., ALAN  
KASMAN DBA KASCO, ALAN L. MERRIL,  
ALLBRIGHT PARKING MANAGEMENT, INC.,  
AMBIENT GROUP, INC., ANN TAYLOR STORES  
CORPORATION, BANKERS TRUST COMPANY,  
BANKERS TRUST CORP., BANKERS TRUST NEW  
YORK CORPORATION, BATTERY PARK CITY  
AUTHORITY, BELFOR USA GROUP, INC., BETTY  
JEAN GRANQUIST, BLACK DIAMONDS LLC,  
BLACKMON-MOORING-STEAMATIC  
CATASTROPHE, INC. D/BA BMS CAT, BOARD OF  
EDUCATION OF THE CITY OF NEW YORK,  
BOARD OF MANAGERS OF THE 120 BROADWAY  
CONDOMINIUM (CONDO #871), BOARD OF  
MANAGERS OF THE HUDSON VIEW EAST  
CONDOMINIUM, BOSTON PROPERTIES, INC.,  
BROADWAY WEST STREET ASSOCIATES  
LIMITED PARTNERSHIP, BROOKFIELD  
FINANCIAL PROPERTIES, INC., BROOKFIELD

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**NOTICE OF ADOPTION  
OF ANSWER TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

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FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., BT PRIVATE CLIENTS CORP., CAROL GAYNOR TRUST, CAROL GAYNOR, AS TRUSTEE OF THE CAROL GAYNOR TRUST, CAROL MERRIL GAYNOR, CENTRAL PARKING SYSTEM OF NEW YORK, INC., CITIBANK, NA, DEPARTMENT OF BUSINESS SERVICES, DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, EDISON PARKING MANAGEMNT, L.P., EMPIRE STATE PROPERTIES, INC., ENVIRONTECH CLEN AIR, INC., FGP 90 WEST STREET INC., FRED GOLDSTEIN, GPS ENVIRONMENTAL CONSULTANTS, INC., HARLAND GAYNOR, AS TRUSTEE UNDER A DECLARATION OF TRUST, HAROLD G. GOLDSTEIN, AS TRUSTEE UNDER A DECLARATION OF TRUST, HERMAN L. BLUM, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, HIGHLAND DEVELOPMENT LLC, HILLMAN ENVIRONMENTAL GROUP, LLC., HUDSON TOWERS HOUSING CO., INC., HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW TOWERS ASSOCIATES, IDELL GOLDSTEIN, AS TRUSTEE UNDER DECLARATION OF TRUST, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., JONES LANG LASALLE AMERICAS, INC., JONES LANG LASALLE SERVICES, INC., KASCO RESTORATION SERVICES CO., KIBEL COMPANIES, LEFRAK ORGANIZATION, INC., LIBERTY VIEW ASSOCIATES, L.P., LIONSHEAD 110 DEVELOPMENT LLC, LIONSHEAD DEVELOPMENT LLC, MARGARET G. WATERS, MARGUERITE K. LEWIS, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, MATTHEW A. GELBIN, AS TRUSTEE OF THE GELBIN FAMILY, MERRILL LYNCH & CO, INC., NATALIE S. LEBOW, AS TRUSTEE OF THE JEREMIAH PHILIP LEBOW REVOCABLE TRUST, NATALIE S. LEBOW, AS TRUSTEE OF THE JERRY P. LEBOW FAMILY TRUST, NEW YORK CITY SCHOOL

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CONSTRUCTION AUTHORITY, NOMURA  
HOLDING AMERICA, INC., NOMURA  
SECURITIES INTERNATIONAL, INC., PAMELA  
BETH KLEIN, AS TRUSTEE OF THE PAMELA  
AND ROWLAND KLEIN TRUST, R Y  
MANGEMENT CO., INC., RELATED BPC  
ASSOCIATES, INC., RELATED MANAGEMENT  
CO., LP, ROWAN K. KLEIN, AS TRUSTEE OF THE  
PAMELA AND ROWAN KLEIN TRUST, RUTH G.  
LEBOW, RY MANAGEMENT, SHIRLEY G.  
SHOCKLEY, AS TRUSTEE UNDER  
DECLARATION OF TRUST, SILVERSTEIN  
PROPERTIES, INC., STEEPLECHASE ACQUISITIO,  
ET AL

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Defendants.

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**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Amended Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint Adding New Defendants Not Previously Served filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).


**PLEASE TAKE FURTHER NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (§(§ D(1)-(5))).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
November 30, 2007

Yours etc.,

**HARRIS BEACH PLLC**

A handwritten signature in black ink, appearing to read 'BAB', is written over a horizontal line.

Brian A. Bender, Esq. (BAB-0218)

HARRIS BEACH PLLC

*Attorney for Defendant*

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MANHATTAN DISASTER SITE LITIGATION

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